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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: IRWIN LUPERON

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 03/04/2006, AGAINST THE MOS:

1. DEPARTMENT RULES VIOLATION-OTHER

ACTION TAKEN: CD ISSUED

CASE CLOSED: 06-01-2006

Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), ARISING FROM CCRB CASE 200914743 (**SEE DUPLICATE ENTRY BELOW**) DATED 09/18/2009, AGAINST MOS LUPERON:

1. SAID MOS LUPERON, ASSIGNED TO 45TH PRECINCT, FAILED TO MAKE ACTIVITY LOG ENTRIES REGARDING A CAR STOP RELATING TO THIS INCIDENT.
2. SAID MOS FAILED TO PREPARE A UF-250 STOP AND FRISK REPORT.

ACTION TAKEN: MOS LUPERON FORFEITED ONE (1) VACATION DAY AND COMMAND DISCIPLINE B
CASE CLOSED ON 3/18/11

Disclosure # 3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 09/24/2010, AGAINST MOS LUPERON:

1. DEPARTMENT RULES VIOLATION-MEMOBOOK INCOMPLETE/IMPROPER

CASE CLOSED ON 05/17/2011.

Disclosure # 4:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. JOSE MORA V CITY OF NEW YORK, 12-CV-4343, FILED IN THE SOUTHERN DISTRICT OF NEW YORK.

Disclosure # 5:

THE MOS PLED GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES AND SPECIFICATIONS:

1. ON OR ABOUT APRIL 19, 2011, THE MOS DID FAIL AND NEGLECT TO TIMELY PREPARE A PROPERTY

CLERK'S INVOICE WORKSHEET (PD521-141A) FOR PERSONAL PROPERTY THAT SAID MOS REMOVED FROM AN INDIVIDUAL THAT HE HAD PLACED UNDER ARREST.

2. ON OR ABOUT AND BETWEEN AUGUST 11, 2010 AND OCTOBER 13, 2010, THE MOS ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS ON TWO (2) OCCASIONS REQUESTED THE ASSISTANCE OF OTHER MEMBERS OF THE SERVICE TO PREVENT THE ADJUDICATION OF SUMMONSES ISSUED TO INDIVIDUALS KNOWN TO SAID MOS.
3. ON OR ABOUT FEBRUARY 12, 2011 AND NOVEMBER 20, 2011, DURING AN INTEGRITY TEST RELATING TO THE DIRECTED ACCIDENT RESPONSE PROGRAM (DARP), THE MOS DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPT., TO WIT: SAID MOS DID FAIL TO NOTIFY THE RADIO DISPATCHER OF A PICK-UP ASSIGNMENT NOT EMANATING FROM THE COMMUNICATIONS SECTION.
4. ON OR ABOUT FEBRUARY 12, 2011, THE MOS DID FAIL AND NEGLECT TO FOLLOW THE DIRECTED ACCIDENT RESPONSE PROGRAM PROCEDURES, TO WIT: SAID POLICE OFFICER DID FAIL TO NOTIFY THE COMMUNICATIONS SECTION DISPATCHER WHEN TOWING SERVICES WERE NEEDED, AS REQUIRED.
5. ON OR ABOUT FEBRUARY 12, 2011 AND NOVEMBER 20, 2011, DURING AN INTEGRITY TEST RELATING TO THE DIRECTED ACCIDENT RESPONSE PROGRAM (DARP), THE MOS DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID POLICE OFFICER DID FAIL AND NEGLECT TO TRANSMIT A FINAL DISPOSITION TO THE RADIO DISPATCHER, AS REQUIRED.
6. ON OR ABOUT FEBRUARY 12, 2011, AND NOVEMBER 20, 2011, DURING AN INTEGRITY TEST RELATING TO THE DIRECTED ACCIDENT RESPONSE PROGRAM (DARP), THE MOS DID FAIL AND NEGLECT TO MAKE PROPER ENTRIES IN SAID POLICE OFFICER'S ACTIVITY LOG.
7. ON OR ABOUT NOVEMBER 20, 2011, DURING AN INTEGRITY TEST RELATING TO THE DIRECTED ACCIDENT RESPONSE PROGRAM (DARP), THE MOS DID FAIL AND NEGLECT TO NOTIFY THE COMMUNICATIONS SECTION DISPATCHER WHEN TOWING SERVICES WERE NEEDED, AS REQUIRED, DID ALLOW AN IMPROPER TOW TRUCK TO TOW A VEHICLE, AND DID FAIL TO PREPARE A TOW TRUCK VIOLATION REPORT FOR AN IMPROPER TOW TRUCK PRESENT ON THE SCENE TO A TOW A VEHICLE.
8. ON OR ABOUT NOVEMBER 20, 2011, DURING AN INTEGRITY TEST RELATING TO THE DIRECTED ACCIDENT RESPONSE PROGRAM (DARP), THE MOS DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID POLICE OFFICER DID USE HIS PERSONAL CELLULAR PHONE TO CALL AN UNAUTHORIZED TOW TRUCK COMPANY.
9. ON OR ABOUT AND BETWEEN MAY 24, 2012, AND MARCH 9, 2013, AFTER HAVING BEEN DIRECTED BY A LIEUTENANT AND OTHER MEMBERS OF INTERNAL AFFAIRS BUREAU GROUP 22 TO DISCONTINUE CONTACT WITH A PERSON KNOWN TO THE DEPARTMENT, THE MOS DID WRONGFULLY AND WITHOUT JUST CAUSE FAIL TO COMPLY WITH SAID LAWFUL ORDER.
10. ON OR ABOUT AND BETWEEN MAY 24, 2012 AND MARCH 9, 2013, THE MOS DID ASSOCIATE WITH SAID PERSON KNOWN TO THE DEPARTMENT, AN INDIVIDUAL REASONABLY BELIEVED TO BE ENGAGED IN, LIKELY TO HAVE ENGAGED IN OR TO HAVE ENGAGED IN CRIMINAL ACTIVITY.

AS A RESULT, THE MOS:

- WAS SUSPENDED WITHOUT PAY AND FORFEITED ALL TIME AND BENEFITS FOR FIFTEEN (15) DAYS;
- FORFEITED FORTY-FIVE (45) VACATION DAYS; AND
- WAS PLACED ON DISMISSAL PROBATION FOR ONE (1) YEAR.

Disclosure # 6:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 05/16/2012, AGAINST THE MOS:

1. DEPARTMENT RULES VIOLATION-TRAFFIC VIOLATIONS BUREAU (TVB)-NON-APPEARANCE

ACTION TAKEN: "B" CD-ISSUED

CASE CLOSED: 09/19/2012

Disclosure # 7:

AT A DEPARTMENTAL TRIAL, THE MOS WAS FOUND GUILTY OF THE FOLLOWING CHARGES AND SPECIFICATIONS, DATED 07/07/2016:

- THE MOS FAILED TO PROPERLY VOUCHER AND SECURE A CELLULAR PHONE RECOVERED FROM AN

ARRESTEE KNOWN TO THE DEPARTMENT.
AS A RESULT, THE MOS FORFEITED EIGHT (8) VACATION DAYS.

Disclosure # 8:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 02/26/2019, AGAINST THE MOS:

1. INVOICE DISCREPANCY - LAB - CONTROLLED SUBSTANCE
2. REPORT INCOMPLETE/INACCURATE - PROPERTY CLERK INVOICE

CASE STATUS: CLOSED

CLOSED DATE: 2019-03-06

ACTION TAKEN: VERBAL OF INSTRUCTIONS

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 9:

CCRB CASE: 200900298

REPORT DATE: 11/24/2008

[REDACTED]
[REDACTED]
[REDACTED]

Disclosure # 10:

CCRB CASE: 200914743 (SEE DUPLICATE ENTRY ABOVE)

REPORT DATE: 09/19/2009

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Disclosure # 11:

CCRB CASE: 201106882

REPORT DATE: 05/27/2011

[REDACTED]
[REDACTED]
[REDACTED]

Disclosure # 12:

CCRB CASE: 201311701

REPORT DATE: 12/15/2013

[REDACTED]
[REDACTED]
[REDACTED]

Eric Gonzalez
District Attorney
Kings County